

EXHIBIT A

Rodney Lee
33 Wood Avenue South, Suite 600
Iselin New Jersey 08830
Rodolee33@aol.com
(908) 355-6580 Phone (732) 676-7730 Fax

May 22, 2020

TO: Clerk of Law Division Middlesex County
Superior Court of New Jersey
56 Paterson Street
P.O. Box 1146
New Brunswick New Jersey 08903

Re: Lee v. Portfolio Recovery Associates
New filing of Complaint

RECEIVED & FILED
2020 JUN 16 A 9:57
MIDDLESEX COUNTY
SPECIAL CIVIL PART

Dear Sir/Madame:


I am the Plaintiff Rodney Lee in the subject matter listed above, enclosed please find my Complaint with filing fee of \$82.00.


Please file with the Court and provide me with a stamp copy of the same.

Thank you very much,

Rodney Lee

CIVIL PROCESS
JUL 13 2020
2020 MAY 27 P 2:00
CLERK OF SUPERIOR COURT
MIDDLESEX COUNTY

 <p>Court's Address and Phone Number: <u>Middlesex</u> Special Civil Part <u>56 Paterson Street</u> <u>New Brunswick New Jersey 08903</u> Telephone No. <u>(732) 645-4300</u></p>	<p align="center">Superior Court of New Jersey Law Division, Special Civil Part <u>Middlesex</u> County Docket No: DC _____</p> <p align="center">Civil Action SUMMONS</p> <p align="center">Check one <input type="checkbox"/> Contract <input checked="" type="checkbox"/> Tort</p>										
YOU ARE BEING SUED!											
<p><u>Person or Business Suing You (Plaintiff)</u></p> <p><u>Rodney Lee</u> _____ _____</p> <p>(See the following page(s) for additional plaintiffs)</p> <p><u>Plaintiff's Attorney Information</u></p> <p><u>33 Wood Avenue South Suite 600</u> <u>Iselin New Jersey 08830</u> <u>rodolee33@aol.com</u> <u>(908) 355-6581 Phone (732) 676-7730 Fax</u></p>	<p><u>Person or Business Being Sued (Defendant)</u></p> <p><u>Portfolio Recovery Associates</u> <u>120 Corporate Blvd Ste 100</u> <u>Norfolk VA 23502</u> _____</p> <p>(See the following page(s) for additional defendants)</p> <p>The Person or Business Suing You Claims You Owe the Following:</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%;">Demand Amount</td> <td style="width: 30%; text-align: right;">\$ 2,000.00</td> </tr> <tr> <td>Filing Fee</td> <td style="text-align: right;">\$ 82.00</td> </tr> <tr> <td>Service Fee</td> <td style="text-align: right;">\$</td> </tr> <tr> <td>Attorney's Fees</td> <td style="text-align: right;">\$</td> </tr> <tr> <td>TOTAL</td> <td style="text-align: right;">\$ 2,082.00</td> </tr> </table>	Demand Amount	\$ 2,000.00	Filing Fee	\$ 82.00	Service Fee	\$	Attorney's Fees	\$	TOTAL	\$ 2,082.00
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Filing Fee	\$ 82.00										
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Attorney's Fees	\$										
TOTAL	\$ 2,082.00										
FOR JUDICIARY USE ONLY											
<p>In the attached complaint, the person or business suing you briefly tells the court his or her version of the facts of the case and how much money he or she claims you owe. If you do not answer the complaint, you may lose the case automatically and the court may give the plaintiff what the plaintiff is asking for, plus interest and court costs. You have 35 days from the date of service to file your answer or a signed agreement. If a judgment is entered against you, a Special Civil Part Officer may seize your money, wages or personal property to pay all or part of the judgment. The judgment is valid for 20 years.</p> <p><u>IF YOU DISAGREE WITH THE PLAINTIFF'S CLAIMS, A WRITTEN ANSWER OR SIGNED AGREEMENT MUST BE RECEIVED BY THE COURT ABOVE, ON OR BEFORE _____, OR THE COURT MAY RULE AGAINST YOU. IF YOU DISAGREE WITH THE PLAINTIFF, YOU MUST DO ONE OR BOTH OF THE FOLLOWING:</u></p> <ol style="list-style-type: none"> 1. <i>Answer the complaint.</i> An answer form that will explain how to respond to the complaint is available at any of the New Jersey Special Civil Part Offices or on the Judiciary's Internet site njcourts.gov. If you decide to file an answer to the complaint made against you: <ul style="list-style-type: none"> • Fill out the Answer form AND pay the applicable filing fee by check or money order payable to: Treasurer, State of New Jersey. Include DC _____ (your Docket Number) on the check. • Mail or hand deliver the completed Answer form and the check or money order to the court's address listed above. • Hand deliver or send by regular mail a copy of the completed Answer form to the plaintiff's attorney. If the plaintiff does not have an attorney, send your completed answer form to the plaintiff by regular and certified mail. This MUST be done at the same time you file your Answer with the court on or before _____. 2. <i>Resolve the dispute.</i> Contact the plaintiff's attorney, or contact the plaintiff if the plaintiff does not have an attorney, to resolve this dispute. The plaintiff may agree to accept payment arrangements. If you reach an agreement, mail or hand deliver the SIGNED agreement to the court's address listed above on or before _____. <p>Please Note - You may wish to get an attorney to represent you. If you cannot afford to pay for an attorney, free legal advice may be available by contacting Legal Services at _____. If you can afford to pay an attorney but do not know one, you may call the Lawyer Referral Services of your local County Bar Association at _____. Notify the court now if you need an interpreter or an accommodation for a disability for any future court appearance.</p> <p align="right">/s/ Name _____ Clerk of the Superior Court</p>											

 <p>Dirección y teléfono del tribunal: Parte Civil Especial de <u>Middlesex</u> 56 Paterson Street New Brunswick New Jersey 08903 Número de teléfono: <u>(732) 645-4300</u></p>	<p align="center">El Tribunal Superior de Nueva Jersey División de Derecho, Parte Civil Especial Condado de <u>Middlesex</u> Número del expediente: DC _____ Demanda de Acción Civil NOTIFICACIÓN DE DEMANDA Marque si es <input type="checkbox"/> Contrato <input checked="" type="checkbox"/> Ilícito Civil</p>										
<p>¡LE ESTÁN DEMANDANDO!</p>											
<p><u>Persona o entidad comercial que le está demandando (el demandante)</u></p> <p>El Demandante: Consigne la información al dorso. (Vea en la(s) página(s) siguiente(s) los demandantes adicionales)</p> <p><u>Información sobre el abogado del demandante</u></p> <p>El Demandante: Consigne al dorso la información sobre el abogado del demandante.</p>	<p><u>Persona o entidad comercial que está siendo demandada (el demandado)</u></p> <p>El Demandante: Consigne la información al dorso. (Vea en la(s) página(s) siguiente(s) los demandados adicionales)</p> <p>La persona o entidad comercial que le está demandando afirma que usted le debe lo siguiente:</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 70%;">Cantidad a la vista</td> <td style="text-align: right; border-bottom: 1px solid black;">\$XXXXXXXXXX</td> </tr> <tr> <td>Tasa judicial</td> <td style="text-align: right; border-bottom: 1px solid black;">\$XXXXXXXXXX</td> </tr> <tr> <td>Cargo del emplazamiento</td> <td style="text-align: right; border-bottom: 1px solid black;">\$XXXXXXXXXX</td> </tr> <tr> <td>Honorarios del abogado</td> <td style="text-align: right; border-bottom: 1px solid black;">\$XXXXXXXXXX</td> </tr> <tr> <td>TOTAL</td> <td style="text-align: right; border-bottom: 1px solid black;">\$XXXXXXXXXX</td> </tr> </table>	Cantidad a la vista	\$XXXXXXXXXX	Tasa judicial	\$XXXXXXXXXX	Cargo del emplazamiento	\$XXXXXXXXXX	Honorarios del abogado	\$XXXXXXXXXX	TOTAL	\$XXXXXXXXXX
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Honorarios del abogado	\$XXXXXXXXXX										
TOTAL	\$XXXXXXXXXX										
<p>PARA USO EXCLUSIVO DEL PODER JUDICIAL</p>											
<p>En la demanda adjunta la persona o entidad comercial que le está demandando le informa brevemente al juez su versión de los hechos de la causa y la suma de dinero que afirma que usted le debe. Si usted no responde a la demanda, puede perder la causa automáticamente y el juez puede dar al demandante lo que está pidiendo más intereses y los costos legales. Usted tiene 35 días a partir de la fecha del emplazamiento para presentar su respuesta o un acuerdo firmado. Si se dicta un fallo en su contra, un Oficial de la Parte Civil Especial puede embargar su dinero, sueldo o sus bienes muebles (personales) para pagar todo el fallo o una parte del mismo. El fallo es válido por 20 años.</p> <p><u>SI USTED NO ESTÁ DE ACUERDO CON LAS ALEGACIONES DEL DEMANDANTE, EL TRIBUNAL TIENE QUE RECIBIR UNA RESPUESTA POR ESCRITO O UN ACUERDO FIRMADO PARA EL _____, O ANTES DE ESA FECHA, O EL JUEZ PUEDE EMITIR UN FALLO EN SU CONTRA. SI USTED NO ESTÁ DE ACUERDO CON EL DEMANDANTE, DEBE HACER UNA DE LAS SIGUIENTES COSAS O LAS DOS:</u></p> <ol style="list-style-type: none"> 1. <i>Responder a la demanda.</i> Un formulario de respuesta que le explicará cómo responder a la demanda está disponible en cualquiera de las Oficinas de la Parte Civil Especial de Nueva Jersey o en el sitio Internet del Poder Judicial njcourts.gov. Si usted decide presentar una respuesta a la demanda que se hizo en su contra: <ul style="list-style-type: none"> • Llene el formulario de Respuesta Y pague la tasa judicial de presentación que corresponda mediante un cheque o giro bancario o postal acreditable al: "Treasurer, State of New Jersey" (Tesorero del Estado de Nueva Jersey). Incluya el número DC _____ (el número de su expediente) en el cheque. • Envíe por correo el formulario de Repuesta llenado y el cheque o giro bancario o postal a la dirección del tribunal que figura más arriba, o entréguelos personalmente en dicha dirección. • Entregue personalmente o envíe por correo común una copia del formulario de Repuesta llenado al abogado del demandante. Si el demandante no tiene abogado, envíe su formulario de respuesta llenado al demandante por correo común y por correo certificado. Esto SE TIENE que hacer al mismo tiempo que presente su Respuesta al tribunal a más tardar el _____. 2. <i>Resolver la disputa.</i> Comuníquese con el abogado del demandante, o con el demandante si éste no tiene abogado, para resolver esta disputa. El demandante puede estar de acuerdo con aceptar arreglos de pago. Si llegara a un acuerdo, envíe por correo el acuerdo FIRMADO a la dirección del tribunal que figura más arriba, o entréguelo personalmente en dicha dirección a más tardar el _____. <p>Nota - Puede que usted quiera conseguir que un abogado para que lo represente. Si usted no puede pagar un abogado, podría obtener consejos legales gratuitos si se comunica con Legal Services (Servicios Legales) llamando al _____. Si usted puede pagar un abogado, pero no conoce a ninguno, puede llamar al Lawyer Referral Services (Servicios de Recomendación de Abogados) del Colegio de Abogados (Bar Association) de su condado local al _____. Notifique al tribunal ahora si usted necesita un intérprete o un arreglo por una discapacidad para cualquier comparecencia futura en el tribunal.</p> <p align="right">/s/ Nombre y apellido _____ Secretario del Tribunal Superior</p>											

Form A

Rodney Lee

Plaintiff's Name (first, middle, last)

33 Wood Avenue South Ste 600

Street Address

Iselin New Jersey 08830

City, State, Zip

(908) 355-6580

Telephone Number

Portfolio Recovery Associates

Defendant's Name (first, middle, last)

120 Corporate Blvd Ste 100

Street Address

Norfolk VA 23502

City, State, Zip

Telephone Number

Superior Court of New Jersey

Law Division, Special Civil Part

Middlesex County

Docket Number

(to be provided by the court)

Civil Action

Complaint

Type or print the reasons you, the Plaintiff(s), are suing the Defendant(s): (See instruction B)
Attach additional sheets if necessary.

See attachment

The amount you, the Plaintiff(s) are demanding from the Defendant(s) \$ 2,000.00.

At the trial Plaintiff will need:

An interpreter

☐ Yes ☒ No Indicate language: _____

An accommodation for disability

☐ Yes ☒ No Indicate accommodation: _____

I certify that the matter in controversy is not the subject of any other court action or arbitration proceeding, now pending or contemplated, and that no other parties should be joined in this action.

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).

05/22/2020

Date

Your Signature

Rodney Lee

Name Typed, Stamped or Printed

BCH # 149 DATE 6-16-2020

CHK/CA/MO # 683

FEE \$ 82.00

OVP \$

COPY/SANC \$

TOTAL \$ 82.00

1 Rodney Lee
2 33 Wood Avenue South, Suite 600
3 Iselin New Jersey 08830
4 Rodolee33@aol.com
5 (908) 355-6580 Phone (732) 676-7730 Fax
6

7 **SUPERIOR COURT OF NEW JERSEY**
8 **LAW DIVISION MIDDLESEX COUNTY**
9

Rodney Lee

Case No.:

Plaintiff,

v.

CIVIL ACTION

Portfolio Recovery Associates

Defendant.

**VERIFIED COMPLAINT FOR
CIVIL PENALTIES FOR NON-
COMPLAINEE**

10 The plaintiff, Rodney Lee complains against Defendant Portfolio Recovery
11 Associates (Portfolio Recovery Associates) and alleges the following:
12

13 1. Pursuant to its agreement with Joan A. Hughes the borrower, the
14 plaintiff Rodney Lee as a person, being duly sworn to law upon my oath, who has
15 personal interest in this litigation, has been authorized to initiate a court proceeding
16 in its own name and has been granted power of attorney effective April 10, 2020. a
17 copy of which is available for review is incorporated herein.

1 2. In accordance with its agreement ¹, Plaintiff Rodney Lee as a “Person” who
2 has various rights relative to seeking a meaningful disclosure of the Capital One
3 Bank, N.A. in reference to an account number (4989193) with Joan A. Hughes, for
4 the purpose of the validity or enforceability or any contract or transaction to
5 Portfolio Recovery Associates, to bring action to secure civil penalties. Specifically,
6 Plaintiff claims arise from Portfolio Recovery Associates failure to comply with 15
7 U.S.C. §1692(g) and 15 U.S.C. §1692(e) requirement to Plaintiff.

8 **NATURE OF THE ACTION**

9
10 3. Plaintiff Rodney Lee, (“Plaintiff”) bring this action for actual damages in the
11 amount of \$2,000.00 under for violation of the Fair Debt Collection Practices Act,
12 15 U.S.C. 1692, et seq. (hereafter the “FDCPA”), with statutory damages and the
13 cost of this action against defendant POROFILIO RECOVERY ASSOCIATES
14 (hereafter referred as (“Portfolio Recovery Associates”). These laws prohibit
15 debt collectors from engaging in abusive, deceptive, and unfair collection practices.

¹ Rodney Lee, Private Advocate (Advocate) who is charged with representing and act as a voice on behalf of and in the interest of Joan A. Hughes (“Joan A. Hughes”) by investigating and addressing complaints or maladministration or a violation of rights. Reviews all of the complaints received, in search of civil liberties issues that Rodney Lee, Advocate may be able to assist with. See Agreement attached hereto.

FACTUAL ALLEGATIONS

8. At all times Complainant does not have a contract with Alleged Defendant POROFILIO RECOVERY ASSOCIATES who has not shown or proven that it is the owner of the original creditor/lender issuer that may have been in collection account and at all times POROFILIO RECOVERY ASSOCIATES has not shown or proven it has interest or equity in the original Application or Agreement with the original creditor/lender issuer Capital One Bank, N.A.

9. On April 14, 2020, Plaintiff, Rodney Lee, sent POROFILIO RECOVERY ASSOCIATES a Notice to determine whether the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 et seq. ("FDCPA") has been fully complied with by POROFILIO RECOVERY ASSOCIATES in connection with account number 4989193 of an original creditor Capital One Bank, N.A. with an alleged balance due of \$11,106.00. as required by § 1692g. See, Plaintiff's demands as **Exhibit "A"** speaks for itself attached hereto.

1 11. To date, Plaintiff complains that POROFILIO RECOVERY ASSOCIATES
2 has not “validated” the debt by furnishing proof that the debt is valid as required by
3 § 1692g.

4
5 12. To date, Plaintiff complains that POROFILIO RECOVERY ASSOCIATES
6 has falsely represented that POROFILIO RECOVERY ASSOCIATES is either an
7 assignee of an original creditor, and/or that said assignment constitutes a proper,
8 competent, or valid assignment between POROFILIO RECOVERY ASSOCIATES
9 and the original creditor or any alleged debt by any alleged original creditor to
10 POROFILIO RECOVERY ASSOCIATES and/or that POROFILIO RECOVERY
11 ASSOCIATES is the original creditor, POROFILIO RECOVERY ASSOCIATES
12 has made material, false and misleading representations, by reporting the account
13 sued on to credit bureaus with misleading information regarding the nature and/or
14 status of said alleged debt with respect to such matters as the identity of the original
15 creditor, the relevant dates and ages of said alleged debt, and other matter which
16 POROFILIO RECOVERY ASSOCIATES knew or should have known would
17 mislead, POROFILIO RECOVERY ASSOCIATES has violated 15 U.S.C.
18 §1692e(2)(A).

1 13. As evident by the writing of the Credit Reports of Joan A. Hughes dated
2 March 5, 2020 and May 3, 2020 as exhibit B attached hereto; POROFILIO

3 RECOVERY ASSOCIATES has continued to report the collection account 4989193
4 on Joan A. Hughes's credit bureaus report of Experian and Equifax.

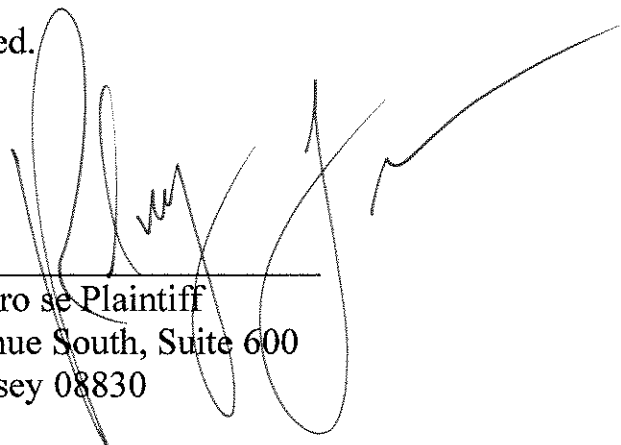
5 **DEMAND FOR RELIEF**

6 14. On that basis, Plaintiff "demand judgment for actual damages with monetary
7 relief for civil money liability penalties and the cost of bringing this action in the
8 sum of \$2,000.00 with statutory damages, with cost pursuant to U.S.C.
9 §1692k(a)(1)." arising from the alleged § 1692 (g) and 1692(e).

10
11 15. In the event, Plaintiff obtains judgment by default, Plaintiff request actual
12 damages in the amount of \$2,000.00 with statutory damages and cost, be awarded
13 upon default.

14
15 I certify that confidential personal identifier's have been redacted from
16 documents now submitted to the court and will be redacted from all documents
17 submitted in the future in accordance with Rule 1:38-7(b).
18

1 I hereby certify that the matter in controversy is not the subject of any other
2 court proceeding or arbitration and that, to the best of my knowledge and belief,
3 no other parties need be joined at this time, and that no other proceedings are
4 contemplated.

5 
6 _____
7 Rodney Lee, Pro se Plaintiff
8 33 Wood Avenue South, Suite 600
9 Iselin New Jersey 08830
10
11

12 Dated: May 22, 2020
13

EXHIBIT A

EXHIBIT A



Rodney Lee, Advocate

33 Wood Avenue South, Suite 600
Iselin, New Jersey 08830
TEL 908 335-6580
FAX 732 676-7730
Rodolee33@aol.com

NOTICE

April 14, 2020

Sent via regular and certified mail# 7018 0680 0002 0685 1398

Notice To: Portfolio Recovery Associates
120 Corporate Blvd Ste 100
Norfolk VA 23502

From: Rodney Lee, Advocate

Re: Account Number# 4989193
Joan A. Hughes Fraser
Original Creditor: Capital One Bank, N.A.
Amount: \$11,106.00

Dear Sir/Madame:

Pursuant to Agreement, Rodney Lee, Advocate ("Advocate")¹ has been instructed by Joan A. Hughes Fraser ("Joan A. Hughes Fraser"), to seek (full disclosure), of the verified as accurate reporting of Portfolio Recovery Associates in connection with the account number 4989193. (see attached hereto) As such, the subject account is now in dispute in its entirety, and I Rodney Lee authorized by Agreement, hereby request full detailed and sufficient verification in accordance with 15 USC § 1692 et seq.

¹ Rodney Lee, Private Advocate (Advocate) who is charged with representing and act as a voice on behalf of and in the interest of Joan A. Hughes Fraser ("Joan A. Hughes Fraser") by investigating and addressing complaints or maladministration or a violation of rights. Reviews all of the complaints received, in search of civil liberties issues that Rodney Lee, Advocate may be able to assist with. See Agreement attached hereto.

April 14, 2020

Sent via regular and certified mail# 7018 0680 0002 0685 1398

Notice To: Portfolio Recovery Associates

Under the Fair Debt Collection Practices Act pursuant to 15 USC § 1692 et seq., I have a right to know the following:

1. Furnish copies of documentary evidence of the consumer's debt, and
2. An Authenticated front and back true copy of the original agreement in full (full and complete disclosure);
3. An Authenticated front and back copy of all documents and records, including but not limited to the **Promissory Notes**, identified as or evidencing assets provided by and/or signed by the consumer.
4. An Authenticated any and all Assignments with Contract.
5. An identification of the source of the funds used to fund the Charges or Loan;
6. The name and address of the Custodian(s) of Records of all relevant documents and account;
7. A statement of the total amount of all payments made by the consumer.

If Portfolio Recovery Associates is unable to provide the "authenticated proof" in writing as I have requested within 30 days to the address listed above, then the result of the investigation of Experian dated 3/5/2020 verification is not an accurate.

By law, the reporting and should updated by a representative of Portfolio Recovery Associates to be remove/deleted its reporting from Joan A. Hughes Fraser personal credit file.

Very Truly Yours,

Rodney Lee, Advocate

Dated: April 14, 2020

Enclosure: Result of Experian Credit Report of Joan A. Hughes Fraser dated 3/5/2020

USPS Tracking®

[FAQs >](#)

[Track Another Package +](#)

Tracking Number: 70180680000206851398

[Remove X](#)

Your package is moving within the USPS network and is on track to be delivered to its final destination. It is currently in transit to the next facility.

In-Transit

April 23, 2020
In Transit to Next Facility

[Feedback](#)

Get Updates 

Text & Email Updates



Tracking History



Product Information



See Less 

Can't find what you're looking for?

Go to our [FAQs](#) section to find answers to your tracking questions.



RODNEY LEE, ADVOCACY

Agreement

THIS AGREEMENT is made this 10 day of April 2020, by and between Rodney Lee, Advocate ("Advocate") who is charged with representing and acting as a voice on behalf of and in the interest of Joan A. Hughes Fraser ("the individual of the public") by investigating and addressing complaints or maladministration or a violation of rights in connection with account #4989193 with Portfolio Recovery Associates as it relates to Capital One Bank, N.A. original creditor.

WHEREAS, the typical duties of Rodney Lee, Advocate are to investigate complaints and attempt to resolve them, through recommendations (binding or not) or mediation. Rodney Lee, Advocate sometimes also aims to identify systematic issues leading to poor service or breaches of people's rights. Rodney Lee, Advocate provide information to people on how to assert their own rights and sometimes advocate on their behalf.

WHEREAS, Rodney Lee, Advocate works to defend against civil liberties and civil rights violations and sometimes act an advocate for individuals and take cases to court that will defend fundamental rights guaranteed by the constitution.

WHEREAS, Rodney Lee, Advocate is not a government agency or a general legal services organization. Rodney Lee, Advocate does not dispense general legal advice, provide emergency services, or make referrals to attorneys.

WHEREAS, Rodney Lee, Advocate reviews all of the complaints received, in search of civil liberties issues that Rodney Lee, Advocate may be able to assist with.

NOW, THEREFORE, in consideration of these mutual promises and Rodney Lee, Advocate assistance, including litigation, is provided free of charge to help people. Rodney Lee, Advocate work relies mainly on individual donations for its funding.

This Agreement was drafted for both Parties and thus, shall not be construed against any Party because both Parties have agreed to the provision.

Wherefore, the Parties have executed this Agreement as of the date set forth above.

Rodney Lee, Advocate

Joan A. Hughes Fraser

Rodney Lee, Advocate

Joan A. Hughes Fraser ("the individual of the public")

Borrower's Certification as to Validity of Power of Attorney

This is to certify, under penalty or perjury according to law, that this is written authorization to provide Rodney Lee, Agent as (Power of Attorney) to release information in writing, or through their Portfolio Recovery Associates as it relates to Capital One Bank, N.A. account number 4989193.

Agent: Rodney Lee
Agent Address: 33 Wood Avenue South Suite 600
Iselin New Jersey 08830

Agent's Signature _____

Rodney Lee

Borrower's name: Joan A. Hughes Fraser
Borrower's Address: 17 Madison Avenue Apt 8
Madison New Jersey 07940

Borrower's Signature _____

Joan A. Hughes Fraser

State New Jersey

County Morris

This document was acknowledged before me on May 12th 2020 (date), by
JOAN A HUGHES FRASER (name of Borrower)

Notary Public Signature _____

My Commission expires _____

ASHTON BAILEY
NOTARY PUBLIC OF NEW JERSEY
COMMISSION EXPIRES FEBRUARY 19, 2026
COMMISSION #50123099

Agent's Certification as to Validity of Power of Attorney

Agent's Name Rodney Lee
Agent's Address 33 Wood Avenue South Ste 600
Agent's City Tsolin Agent's State NJ Agent's ZIP Code 08830
Principal's Name Joan A. Hughes Fisher Borrower's account# 4989193

By completing this affidavit, I, the Agent, certify that:

1. To the best of my knowledge, the Principal had the capacity to and did executed the Power of Attorney (the Agreement) in which I am named his/her Agent;
2. The Principal is alive and has not revoked the Power of Attorney or my authority to act under the Power of Attorney;
3. The authority granted to me in the Power of Attorney was not fraudulently obtained;
4. I acknowledge my duty of candor and obligation to provide ethical representation and/or advice to the borrower;
5. I understand that the borrower may revoke my authorization to act at anytime orally or in writing;
6. The Power of Attorney and my authority to act under the Power of Attorney have not been terminated; and
7. If my authorization is revoked, I will stop acting on behalf of the borrower.

Agent's Signature [Signature]
State New Jersey County Union

This document was acknowledged before me on 5/22/2020 (date), by Rodney Lee (name of agent).

Notary Public Signature [Signature] My Commission expires 8/31/2022

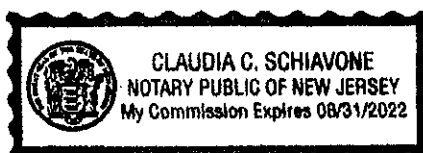


EXHIBIT B

EXHIBIT B

PO Box 9701
Allen, TX 75013



0000150 02 AUG 2016 **AUTO T1 07056 07040-143500 JC02-P00150-1
JOAN ANTOINETTE HUGHES
17 MADISON AVE APT 8
MADISON NJ 07840-1435



JOAN ANTOINETTE HUGHES

Dispute Results

Report # 1988-7283-62 for 03/05/20

Our reinvestigation of the dispute(s) and/or other request(s) you recently submitted is now complete. If an item you disputed is not in the list of results below, it was either not appearing in your credit file or it already reflected the requested status at the time of our reinvestigation.

OTHER ITEMS DISPUTED ARE NOT CURRENTLY DISPLAYING ON YOUR PERSONAL CREDIT REPORT:-

In response to your recent request, we are sending you this credit report. Before contacting us, please review this report carefully. If you disagree with an item, you may dispute it. We process disputes generally by sending your dispute to the furnisher of the information or to the vendor who collected the information from a public record. If we were able to make changes to your credit report based on information you provided, or if you requested the addition of a statement, we have done so. Otherwise, we have contacted the company reporting the information you disputed, supplied them all relevant information and any documents you gave us with your dispute, and instructed them to review all information we provide them about your dispute; verify the accuracy of the information; provide us a response to your dispute; and update their records and systems as necessary.

How to read your results

Deleted - This item was removed from your credit report. **Remains** - The company that reported the information has certified to Experian that the information is accurate. This item was not changed as a result of our processing of your dispute. **Updated** (Your results will indicate which one of the following applies.) - a) The information you disputed has been updated. Please review your report for the details. b) The item you disputed has been updated, which may include an update to the disputed information. Please review your report for the details. c) The information you disputed has been verified as accurate, however, information unrelated to your dispute has been updated. Please review your report for the details. d) Information on this item has been updated. Please review your report for the details. **Processed** - This item was either updated or deleted; Please review your report for the details.

Here are your results

Credit items

PORTFOLIO RECOV ASSOC 4989193... Outcome: Updated - The information you disputed has been verified as accurate; however, information unrelated to your dispute has been updated. Please review your report for the details.

Before dispute

PORTFOLIO RECOVERY ASSOCIATES Partial Acct # 4989193... 120 CORPORATE BLVD STE 100 NORFOLK VA 23502 (844) 675 3406

Date opened	First reported	Recent balance	Payment history
Jul 2018	Oct 2018	\$11,106 as of Feb 2020	Jan Feb Mar Apr May Jun Jul Aug Sep Oct Nov Dec
Address ID #	Terms	Status	2020 C C
0293339227	1 Months	Collection account.	2019 C C C C C C C C C C C
Original creditor	Monthly payment	\$11,106 past due as of Feb 2020.	2018 C C C
CAPITAL ONE N.A.	Not reported	This account is scheduled to continue on record until Jul 2024.	
Type	Credit limit or original amount	Date of Status	
Debt Buyer	\$12,985	Jul 2018	
Responsibility	High balance		
Individual	Not reported		
	Recent payment		
	\$150		

2055-02-20-0000150-0001-4000980

Confirmation # 0114077551

CREDIT FILE : May 3, 2020

>>> We have researched the collection account. Account # - 2437892 The results are: We have verified that this item has been reported correctly. If you have documents that release you from this obligation, please forward a copy to us. THE FOLLOWING FIELDS HAVE BEEN MODIFIED: *STATUS DATE *BALANCE DATE. If you have additional questions about this item please contact: Simon Agency Inc, 3713 Brewerton Rd Ste 1, N Syracuse NY 13212-3867 Phone: (315) 454-8700

Account Number [REDACTED] Date Reported [REDACTED] Date Assigned [REDACTED] Creditor Class [REDACTED] Original Amount [REDACTED]
Status Date Status 05/20/20 Unsettled [REDACTED] Date of 1st Delinquency [REDACTED] Balance Date [REDACTED] Balance Amount [REDACTED]

ADDITIONAL INFORMATION:

Affected By Natural or Declared Disaster

Credit Account Information

(For your security, the last 4 digits of account number have been redacted)

Account History	1 : 30-59 Days Past Due	5 : 150-179 Days Past Due	J : Voluntary Surrender
Status Code	2 : 60-89 Days Past Due	6 : 180 or More Days Past Due	K : Repossession
Descriptions	3 : 90-119 Days Past Due	G : Collection Account	L : Charge Off
	4 : 120-149 Days Past Due	H : Foreclosure	

>>> We have researched the credit account. Account # - CAPITAL -4989193* The results are: We have verified that this item has been reported correctly. If you have documents that release you from this obligation, please forward a copy to us. THE FOLLOWING FIELDS HAVE BEEN MODIFIED: *BALANCE *PAST DUE *DATE OF LAST PAYMENT *ADDITIONAL INFORMATION. If you have additional questions about this item please contact: Portfolio Recovery Assoc, Riverside Commerce Center, 120 Corporate Blvd Ste 100, Norfolk VA 23502-4962

Portfolio Recovery Associates Riverside Commerce Center 120 Corporate Blvd Ste 100 Norfolk VA 23502-4952
Account Number CAPITAL -4989193* Date Opened 07/18/2018 High Credit \$12,985 Credit Limit \$0 Terms Duration 18 Months Term Frequency 18 Months Repaid Activity Designator Banking
Items As of Balance Amount Past Due Date Reported \$10,655 \$10,655 04/20/20 Actual Payment Amount \$150 Scheduled Payment Amount \$0 Date of Last Payment 07/18/2018 Date of Last Activity 10/20/2017 Date Del. 1st Del. 10/20/2017 Deferred Pay Balloon Pay Amount \$0 Balloon Pay Date Closed Date
Status Collection Account Open Type of Account Debt Buyer Account Whose Account Individual Account Original Creditor CAPITAL ONE N A
Type of Loan Debt Buyer Account

ADDITIONAL INFORMATION:

Consumer Disputes After Resolution

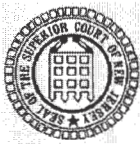
Collection Account

Account History with Status Codes

02/2020

4

(Continued On Next Page)



Court's Address and Phone Number:
MIDDLESEX Special Civil Part
56 PATERSON STREET, 3RD FLOOR
P.O. BOX 1146
NEW BRUNSWICK, NJ 08903-1146
732-645-4300 ext.88382

**Superior Court of New Jersey
Law Division, Special Civil Part**

MIDDLESEX County
Docket No: **MID-DC-005895-20**

**Civil Action
CONTRACT DISPUTE**

YOU ARE BEING SUED!

Person or Business Suing You (Plaintiff)

Rodney Lee

Plaintiff's Attorney Information

Person or Business Being Sued (Defendant)

Portfolio Recovery Associates

The Person or Business Suing You Claims You Owe the Following:

Demand Amount	\$2000.00
Filing Fee	\$50.00
Service Fee	\$7.00
Attorney's Fees	\$0.00
TOTAL	\$2057.00

In the attached complaint, the person or business suing you briefly tells the court his or her version of the facts of the case and how much money he or she claims you owe. **If you do not answer the complaint, you may lose the case automatically and the court may give the plaintiff what the plaintiff is asking for, plus interest and court costs. You have 35 days from the date of service to file your answer or a signed agreement.** If a judgment is entered against you, a Special Civil Part Officer may seize your money, wages or personal property to pay all or part of the judgment. The judgment is valid for 20 years.

IF YOU DISAGREE WITH THE PLAINTIFF'S CLAIMS, A WRITTEN ANSWER OR SIGNED AGREEMENT MUST BE RECEIVED BY THE COURT ABOVE, ON OR BEFORE 08/03/2020, OR THE COURT MAY RULE AGAINST YOU. IF YOU DISAGREE WITH THE PLAINTIFF, YOU MUST DO ONE OR BOTH OF THE FOLLOWING:

1. ***Answer the complaint.*** An answer form that will explain how to respond to the complaint is available at any of the New Jersey Special Civil Part Offices or on the Judiciary's Internet site njcourts.gov under the section for Forms. If you decide to file an answer to the complaint made against you:
 - Fill out the Answer form AND pay the applicable filing fee by check or money order payable to: **Treasurer, State of New Jersey.** Include **MID-DC-005895-20** (your Docket Number) on the check.
 - Mail or hand deliver the completed Answer form and the check or money order to the court's address listed above.
 - Hand deliver or send by regular mail a copy of the completed Answer form to the plaintiff's attorney. If the plaintiff does not have an attorney, send your completed answer form to the plaintiff by regular and certified mail. This MUST be done at the same time you file your Answer with the court on or before **08/03/2020.**
2. ***Resolve the dispute.*** Contact the plaintiff's attorney, or contact the plaintiff if the plaintiff does not have an attorney, to resolve this dispute. The plaintiff may agree to accept payment arrangements. If you reach an agreement, mail or hand deliver the **SIGNED** agreement to the court's address listed above on or before **08/03/2020.**

Please Note - You may wish to get an attorney to represent you. If you cannot afford to pay for an attorney, free legal advice may be available by contacting Legal Services at 732-249-7600. If you can afford to pay an attorney but do not know one, you may call the Lawyer Referral Services of your local County Bar Association at 732-828-0053. Notify the court now if you need an interpreter or an accommodation for a disability for any future court appearance.

/s/ Michelle M. Smith

Clerk of the Superior Court





Dirección y teléfono del tribunal
Parte Civil Especial de MIDDLESEX
56 PATERSON STREET, 3RD FLOOR
P.O. BOX 1146
NEW BRUNSWICK, NJ 08903-1146
732-645-4300 ext.88382

El Tribunal Superior de Nueva Jersey
División de Derecho, Parte Civil Especial

Condado de MIDDLESEX
Número del expediente MID-DC-005895-20

Demanda de Acción Civil
NOTIFICACIÓN DE DEMANDA
CONTRACT DISPUTE

¡LE ESTÁN DEMANDANDO!

Persona o entidad comercial que le está demandando (el demandante)

Rodney Lee

Información sobre el abogado del demandante

Persona o comercial ser demandada (el demandado)

Portfolio Recovery Associates

La persona o comercial que le está demandando afirma que usted le debe lo siguiente:

Cantidad a la vista	\$2000.00
Tasa judicial	\$50.00
Cargo del emplazamiento	\$7.00
Honorarios del abogado	\$0.00
TOTAL	\$2057.00

En la demanda adjunta la persona o entidad comercial que le está demandando le informa brevemente al juez su versión de los hechos de la causa y la suma de dinero que afirma que usted le debe. **Si usted no responde a la demanda puede perder la causa automáticamente y el juez puede dar al demandante lo que está pidiendo más intereses y los costos legales. Usted tiene 35 días a partir de la fecha del emplazamiento para presentar su respuesta o un acuerdo firmado.** Si se dicta un fallo en su contra, un Oficial de la Parte Civil Especial puede embargar su dinero, sueldo o sus bienes muebles (personales) para pagar todo el fallo o una parte del mismo. El fallo es válido por 20 años.

SI USTED NO ESTÁ DE ACUERDO CON LAS ALEGACIONES DEL DEMANDANTE, EL TRIBUNAL TIENE QUE RECIBIR UNA RESPUESTA POR ESCRITO O UN ACUERDO FIRMADO PARA EL 08/03/2020 O ANTES DE ESA FECHA, O EL JUEZ PUEDE EMITIR UN FALLO EN SU CONTRA. SI USTED NO ESTÁ DE ACUERDO CON EL DEMANDANTE, DEBE HACER UNA DE LAS SIGUIENTES COSAS O LAS DOS:

- 1. Responder a la demanda.** Un formulario de respuesta que le explicará cómo responder a la demanda está disponible en cualquiera de las Oficinas de la Parte Civil Especial de Nueva Jersey o en el sitio Internet del Poder Judicial njcourts.gov bajo la sección de formularios (Forms). Si usted decide presentar una respuesta a la demanda que se hizo en su contra:
 - Llene el formulario de Respuesta Y pague la tasa judicial de presentación que corresponda mediante un cheque o giro bancario o postal acreditable al: "Treasurer, State of New Jersey" (Tesorero del Estado de Nueva Jersey). Incluya MID-DC-005895-20 (el número de su expediente) en el cheque.
 - Envíe por correo el formulario de Respuesta llenado y el cheque o giro bancario o postal a la dirección del tribunal que figura más arriba, o entréguelos personalmente en dicha dirección.
 - Entregue personalmente o envíe por correo común una copia del formulario de Respuesta llenado al abogado del demandante. Si el demandante no tiene abogado, envíe su formulario de respuesta llenado al demandante por correo común y por correo certificado. Esto SE TIENE que hacer al mismo tiempo que presente su Respuesta al tribunal a más tardar el **08/03/2020**.
- 2. Resolver la disputa.** Comuníquese con el abogado del demandante, o con el demandante si éste no tiene abogado, para resolver esta disputa. El demandante puede estar de acuerdo con aceptar arreglos de pago. **Si llegara a un acuerdo, envíe por correo o entregar personalmente el acuerdo FIRMADO** a la dirección del tribunal que figura más arriba, o entréguelo personalmente en dicha dirección a más tardar el **08/03/2020**.

Nota - Puede que usted quiera conseguir que un abogado para que lo represente. Si usted no puede pagar a un abogado, podría obtener consejos legales gratuitos si se comunica con Legal Services (Servicios Legales) llamando al 732-249-7600. Si usted puede pagar a un abogado, pero no conoce a ninguno, puede llamar al Lawyer Referral Services (Servicios de Recomendación de Abogados) del Colegio de Abogados (Bar Association) de su condado local al 732-828-0053. Notifique al tribunal ahora si usted necesita un intérprete o un arreglo por una discapacidad para cualquier comparecencia futura en el tribunal.

/s/ Michelle M. Smith

Subsecretario(a) del Tribunal Superior

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MIDDC00589520
Middlesex Civil Div.
P.O. Box 1146
New Brunswick, NJ 08903



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PORTFOLIO RECOVERY ASSOCIATES
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STE 100
NORFOLK, VA 23502

